

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

Case No. 1:19-cr-10080-NMG

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE TO FILE UNDER SEAL  
(1) OFFER OF PROOF AND (2) MOTION TO ADMIT**

Defendants Gamal Abdelaziz and John Wilson respectfully move this Court for leave to file under seal (1) the exhibits to their forthcoming Offer of Proof for Evidence Excluded in the Examination of Rebecca Chassin and (2) their forthcoming Motion to Admit Extrinsic Evidence for Impeachment of Pat Haden, Alex Garfio, and Timothy Brunold and its accompanying exhibits. Defendants' exhibits to their offer of proof and their motion to admit and its exhibits will include sensitive, confidential, and personally identifiable information about USC students. Accordingly, under Local Rule 7.2, Defendants ask that the Court grant leave to file under seal the above-referenced filings. Defendants will publicly file the offer of proof and a redacted version of the motion to admit, and so that the relevance is clear, will provide the Court and Government with unredacted copies of their filings and sealed versions of their accompanying exhibits.

Respectfully submitted,

By their counsel

/s/ Lauren Papenhausen

Lauren Papenhausen (BBO# 655527)  
Michael Kendall (BBO #544866)  
WHITE & CASE LLP  
75 State Street  
Boston, MA 02109-1814  
Telephone: (617) 979-9310  
michael.kendall@whitecase.com  
lauren.papenhausen@whitecase.com

Andrew Tomback (pro hac vice)  
McLaughlin & Stern, LLP  
260 Madison Avenue  
New York, NY 10016  
Telephone: (212) 448-1100  
ATomback@mclaughlinstern.com

*Counsel for John Wilson*

Date: September 27, 2021

/s/ Brian T. Kelly

Brian T. Kelly (BBO # 549566)  
Joshua C. Sharp (BBO # 681439)  
Lauren M. Maynard (BBO # 698742)  
NIXON PEABODY LLP  
53 State Street  
Boston, MA 02109  
(617) 345-1000  
bkelly@nixonpeabody.com  
jsharp@nixonpeabody.com  
lmaynard@nixonpeabody.com

Robert Sheketoff (BBO # 457340)  
One McKinley Square  
Boston, MA 02109  
(617)-367-3449

*Counsel for Gamal Abdelaziz*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1**

The undersigned counsel hereby certifies that counsel for Defendants have conferred with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government assents to Defendants' request to file under seal.

/s/ Lauren Papenhausen

Lauren Papenhausen

**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Lauren Papenhausen

Lauren Papenhausen